

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FARRAH KULE-RUBIN, LANA RYBAK, SHEILA YEN- :
PFISTER, JEANETTE PENALVER, REBECCA :
SCHLOSSBERG, TIEU PHAN CHAN, LAI WAN NG, : Civil Action No.:
SHAOLI HU ZHANG, CLAUDETTE JEAN-BAPTISTE, : 11 CIV 2424 (TPG) (JLC)
MOON CHAN and FUN YIM NG, :
: Plaintiffs, :
: NOTICE OF MOTION
- against - :
: BAHARI GROUP LIMITED; REZA BAHARI, in his :
individual and official capacities; FATTANEH BAHARI, in :
her individual and official capacities; and "JOHN DOES 1 :
through 5," whose names are not currently known, in their :
individual and official capacities, :
: Defendants. :
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the
Affirmation of David E. Gottlieb and exhibits attached thereto, Plaintiffs hereby respectfully
move this Court before the Honorable Thomas P. Griesa at the United States District Court,
Southern District of New York, 500 Pearl Street, New York, New York 10007, at a time and
date to be set by the Court, for an Order, pursuant to Rule 12(c) of the Federal Rules of Civil
Procedure, for partial judgment on the pleadings as to (i) Plaintiffs' claims for failure to pay the
statutory minimum wage under state and federal law, (ii) Plaintiffs' state law claims for failure
to pay earned wages and (iii) Plaintiffs' claims for personal liability under Business
Corporation Law § 630, and for such further relief as the Court may deem just and proper.

Dated: October 11, 2011
New York, New York

Respectfully submitted,
THOMPSON WIGDOR LLP

By: 
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